

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:**

)

**BIG ORANGE SANITATION  
SERVICES, INC.**

)

**No. 17-58598-BEM**

**Debtor.**

)

**Chapter 11**

**DEBTOR'S MOTION FOR EXPEDITED HEARING ON THE FOLLOWING  
MOTION:**

**(1) DEBTOR'S APPLICATION TO PAY CLAIMS OF DEBTOR'S  
EMPLOYEES FOR PRE-FILING WAGES;**

COMES NOW Big Orange Sanitation Services, Inc., ("movant") through its counsel of record, and moves this Court for an expedited hearing pursuant to Rule 9013-4, Bankruptcy Local Rules for the Northern District of Georgia, and in support thereof shows this Court as follows:

1.

The debtor filed this Chapter 11 petition on May 12, 2017, and is operating as debtor in possession.

3.

After the petition date, the debtor filed the following motions/adversaries: application to employ Attorney [Doc. No. 13], Complaint to determine validity of lien of Richard Whitcomb Trust [Doc. No. 16], and Motion for Authority to pay employees their pre-petition wages [Doc. No. 11]. The debtor initially prepared but did not ultimately need to file motions concerning the utilities or to unfreeze bank accounts. Those matters were resolved without motion. Debtor's initially prepared motion to use cash collateral is obviated by the Complaint against the Whitcomb Trust, which claim debtor now believes is unsecured.

4.

The motion to pay employees must be heard on an expedited bases so as to pay employees to insure their continued, uninterrupted status and avoid disruption of debtor's business

WHEREFORE, Debtor respectfully requests that this Court issue an Order:

- a) Schedule an expedited hearing on the referenced motion; and
- b) Granting such other and further relief as is appropriate.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Michael Familetti  
Attorney for Movant  
142 S. Park Square

Marietta, GA 30060  
(770) 794-8005 GA Bar 254941

### **CERTIFICATE OF SERVICE**

**I have this day served the following parties with a copy of the foregoing Motion, via first class mail, and otherwise as noted:**

**David Weidenbaum, Esq.**  
**Attorney for US Trustee**  
**75 Ted Turner Drive 362**  
**Atlanta, GA 30303**  
**(via ECF)**

**Mercedes-Benz Finance (Daimler)**  
**P.O. Box 685**  
**Roanoke, TX 76262**  
**(via email to tim.perkins@daimler.com)**

**Ryen Isenberg, Esq.**  
**Attorney for the Richard Whitcomb Trust**  
**600 Embassy Row**  
**Suite 150**  
**6600 Peachtree Dunwoody Rd.**  
**Atlanta, GA 30328**  
**(via ECF)**

**(20 largest unsecured creditors)**

\_\_\_\_\_/s/  
Michael Familetti, May 24, 2017

United States Bankruptcy Court for the: Northern District of  
Georgia  
 (State)

☒ Check if this is an amended filing

Case number (if known): 17-58598

## Official Form 204

### Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Advanced Disposal 1897 Cobb Services Pkwy Marietta, GA 30008		services				12,504
2	AMCS Group 119 S. Fifth St. Oxford, PA 19363						13,073
3	Action Tire 410 Lees Mill Rd. Forest Park, GA 30297		tires				6,801
4	Blue Cross P.O. Box 6406 Carol Stream, IL 60197		Ins.				8,670
5	Complete Lift Service 9579 Jackson Trail Rd. Hoschton, GA 30548						8,101
6	Diversified Electronics P.O. Box 566 Forest Park, GA 30298						1,451
7	Proda Technology 3932 Atlanta Rd. Smyrna, Ga 30080						21,900
8	Rehrig Pacific 1000 Raco Court Lawrenceville, GA 30046		Containers - PMSI		104,000	20,000	84,000

Debtor

Name

Case number (if known) 17-58598

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Tom Davis Properties 10904 Crabapple Court Roswell, GA 30075						20,000
10	Boss Waste to Energy 4195 JVL Industrial Park Dr. Marietta, GA 30066						135,359
11	Louise Dabezles 3012 Canton St. New Orleans, LAe						4,000
12	Zurich P.O. Box 660347 Dallas, TX 75266		Ins.				22,000
13	Suntrust P.O. Box 751290 Baltimore, MD 21279		Revolving				12,900
14	Vertical Communication 1000 Holcomb Woods Pkwy 300 Atlanta GA 30076						4,800
15	PeachState Freightliner 6535 Crescent Dr. Norcross, GA 30071						3,011
16	Carolina Environmental Systems 500 Lee Industrial Blvd Austell, GA 30168						1,868
17	AccuAir 6175 Hickory Flat Highway 110 Canton, GA 30115		services				3,000
18	Airgas 109 P. Rickman Industrial dr. Holly springs, GA 30115						6,074
19	Dilmar Oil Co. 1951 W. Darlington St. Florence, SC 29501		materials				4,809

20	Smyrna Transfer Station 4696 South cobb Dr. Smyrna, GA 30080						1,000
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